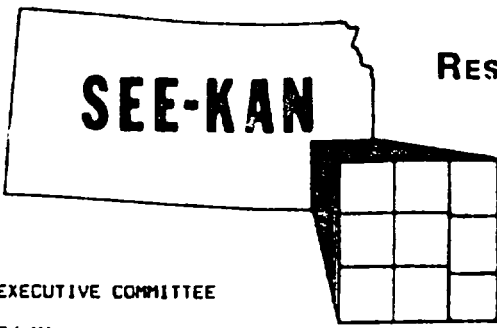


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RESOURCE CONSERVATION AND DEVELOPMENT PROJECT, INC.

See-Kan RC&D Office, 7th & Country Club Road, Route 2, Box 293-A
Chanute, Kansas 66720 Tel.(316)431-6180

August 14, 1989

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Mr. Glenn Curtis
U.S.Environmental Protection Agency
Superfund Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Curtis:

Some of our board members and staff attended the Galena meeting Thursday night August 3 where the proposed plan to protect surface and ground waters in and around Galena was presented. We are very disappointed at the approach taken by EPA to consider placing the chat and rock beneath the surface and covering it up. Out of sight does not mean the problems of ground water contamination are solved.

We would like to suggest a different approach to protecting the water and air at Galena. Rather than placing all the waste chat and rock underground, we believe that burial on the surface has considerable merit. The major chat piles could be used as collection areas for chat and rubble in the area. As the scattered waste is gathered, it could be added to the chat piles by building rather flat slopes to the piles. When the waste material is collected in the designated areas, these piles could then be covered with clay and top soil. A layer of clay a foot or more in depth could be compacted over the waste material and then covered with a foot or so of top soil. If the slopes were in the range of three to five percent grades, the water would run off the piles without much percolation and yet not cause damaging erosion.

We see the burial of these wastes underground as a threat to the ground water because most of the underground mines now have water in them. Some of this is acid and the remainder could become acid when surface wastes are added. Even if wastes are placed in dry mine shafts, there is no assurances that these mines will not flood as additional filling and reclamation takes place in Galena and the surrounding region in years to come. Once these wastes are underground, the cost to clean up the ground water will be more expensive than your previous proposal to rerun the chat and remove the heavy metals.

By surface burial much less chat and fine material will need to be moved, thereby keeping the dust to a minimum. It is these fines that contains the bulk of the heavy metal, according to the information presented at the Galena meeting. When these are being moved there will be a danger of air pollution.

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SUPERFUND RECORDS



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Page Two

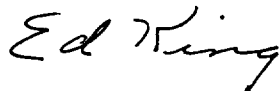
Glenn Curtis

One possible negative will be perceived, especially by the local people. That is, they will not get their mine shafts closed and prevent future cave-ins. According to your report, you will not be capping mine shafts, only filling them and covering with soil. Nothing will keep these shafts from settling and reopening in the future. By filling the voids, you will not prevent future cave-ins since the underground rooms will not be completely filled. Cave-ins may not be as severe as before, but never the less, they can and will likely occur.

We do not know the cost of surface burial but feel it is a method that should be studied and determined if it can do a better job of protecting the waters and air around Galena than deep burial. Cost is a consideration, but should not dictate the method used to correct this long existing problem caused by improper waste disposal by mining interests in years past. The QUALITY OF DISPOSAL NOW will affect the QUALITY OF LIFE AND HEALTH of the Galena area residences FOR GENERATIONS TO COME.

Please advise as to the action taken on this suggestion. We will be more than willing to work with you on details of our proposed method of disposal if you so desire.

Sincerely,

A handwritten signature in cursive script that reads "Ed King".

Ed King, President,
See-Kan RC&D Board

cc: Cherokee County Commission
Mayor of Galena

